

EXHIBIT 1

CATHERINE M. CORFEE SBN 155064
 ZACHARY M. BEST SBN 166035
 CORFEE STONE LAW CORPORATION, PC
 P.O. Box 1098
 Carmichael, CA 95609
 Telephone: (916) 487-5441
 Facsimile: (916) 487-5440
 Email: catherine@corfeestone.com
assistant@corfeestone.com

Attorney for Defendants
 Edward and Debra Li,
 Individually and in representative capacity
 Of Li Family Trust Dated March 10, 1988

JOEL WAELTY
 Jachimowicz Law Group
 2007 W. Hedding Street
 Suite 100
 San Jose, CA 95128

Attorney for Defendant
 JIANWEI SHOU

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

SCOTT JOHNSON)	Case No.: 5:19-cv-08075-EJD
)	
Plaintiff,)	
v.)	DEFENDANTS' AMENDED JOINT
)	FRCP 68
EDWARD K. LI, in individual and)	
representative capacity of the Li Family Trust)	
dated March 10, 1988; DEBRA LI, in)	
individual and representative capacity of the Li))	
Family Trust dated March 10, 1988; JIANWEI))	
SHOU; and DOES 1-10,)	
)	
)	
Defendants.)	
)	
)	

MAR 16 2020

Defendants **PLEASE TAKE NOTICE** that pursuant to Rule 68 of the FEDERAL RULES OF CIVIL PROCEDURE ("FRCP"), Defendants EDWARD K. LI, in individual and representative capacity of the Li Family Trust dated March 10, 1988; DEBRA LI, in individual and representative capacity of the Li Family Trust dated March 10, 1988 and JIANWEI SHOU ("Defendants"), by and through their law firm does and hereby make an offer of judgment against Defendants' in favor of Plaintiff for a total of \$6500 for statutory damages per the California Unruh Act, plus an additional amount of reasonable attorney fees as allowed by law per the Unruh Act claim, which shall be determined by the Court.

Defendants' have voluntarily agreed to and started making the changes per the alleged ADA barriers listed in the Complaint and have retained a CASp but without admitting liability.. They do not admit that Plaintiff intended to enjoy the goods and services or will return, however, they will make ADA changes to make it more perfect per the ADA 2010 codes, and will keep and maintain said ADA elements in working and usable conditions for the disabled. They also have a written ADA Policy & Procedures Manual, which includes each Defendant having a policy to make modifications to the existing and all ADA elements at their facility, and will modify their policies and procedures to make reasonable accommodations so long as such does not fundamentally alter the goods and/or services, and as provided by law. The ADA compliance will be and/or is as follows:

1. Accessible path of travel from the parking to the entrance
2. Accessible path of travel from the public right away to the facility.
3. Compliant counter and restrooms per the ADA and Title 24 as to the counter.
4. Defendants have the ADA policy manuals to address the duty to maintain the ADA features it has and to make modifications to their policies to reasonably accommodate a disabled's request for access.

Based on the above, the Plaintiff hereby accepts the Defendant's FRCP 68 offer.

Dated: _____

Scott Johnson, Plaintiff